

STATEMENT OF BASIS (AI No. 24733)

for the draft modified Louisiana Pollutant Discharge Elimination System permit No. **LA0003204** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Port of South Louisiana
Globalplex Intermodal Terminal
Post Office Box 909
LaPlace, LA 70069-0909

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Lisa Kemp

DATE PREPARED: December 5, 2007

1. PERMIT STATUS**A. Reason For Permit Action:**

Modification of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit to add Outfalls 102 and 103, following regulations promulgated at LAC 33:IX.3105. In accordance with LAC 33:IX.3105.B.2, only those permit limitations and conditions pertaining to the draft modification(s) are open for public comment.

On April 14, 2007, LDEQ issued an LPDES permit to a new tenant of the Port of South Louisiana at the Globalplex facility in Reserve. The new tenant is Associated Terminals; LPDES permit LA0122483, AI No. 142483. Associated Terminals at Globalplex operates a dry bulk and general cargo handling facility that loads and unloads barges, ships, railcars, and trucks. According to the modification request, since the Port's stormwater system would contain any discharge from the Associated Terminal facility, then drain into Parish and State waterways, the Port would like to retain the monitoring and reporting capability of these internal outfalls. The Port and Associated Terminals have agreed to transfer the two outfalls on the Associated Terminals LPDES permit (Outfall 001 and 002) to the Port's LPDES permit, LA0003204. Associated Terminals will submit a request for termination of LPDES permit LA0122483 upon finalization of this permit modification.

B. LPDES permit - LPDES permit effective date: May 1, 2006
LPDES permit expiration date: April 30, 2011
EPA has not retained enforcement authority.

C. Date Modification Request Received: October 9, 2007; additional information received on November 5, 2007 and November 30, 2007

2. FACILITY INFORMATION**A. FACILITY TYPE/ACTIVITY - terminal warehousing services**

Port of South Louisiana, Globalplex Intermodal Terminal is an existing facility which provides terminal warehousing services and property rental to tenants who discharge via the Globalplex Intermodal Terminal.

Statement of Basis for
 Port of South Louisiana, Globalplex Intermodal Terminal
 LA0003204, AI No. 24733
 Page 2

Associated Terminals at Globalplex is a new tenant which operates a dry bulk and general cargo handling facility at the site. Cargo is unloaded by electric cranes located outside and can be stored on concrete pads which are also located outside. There are also two bagging operations at the Associated Terminals facility which are located inside buildings. Any of the commodities can be bagged. The commodities handled at the facility include ferris alloys, steel, coal, sand, fertilizer, cement, sugar, and clay. Note: Coal is only handled and stored in the northern part of the Associated Terminals facility.

All equipment at the Associated Terminals facility is stored under roof and all maintenance is done under roof. There are two areas where dust and dirt are rinsed from the forklifts. No soaps or detergents are used. The discharges from this facility are equipment washdown and stormwater that contacts cargo that is loaded, unloaded, and/or stored outside.

B. FEE RATE

1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4226, 4411, 4421, 4491, 4783

C. LOCATION - 155 West 10th Street, in Reserve, St. John the Baptist Parish
 Latitude 30° 3' 20", Longitude 90° 34' 01"

3. OUTFALL INFORMATION

Outfall 002

Discharge Type: non-contact stormwater runoff from construction area, warehouses, and demolition area, and previously monitored Outfall 102
 Treatment: none
 Location: at the point of discharge to a ditch adjacent to IC railroad near the east side of the property at West 10th Street and Railroad Avenue
 (Latitude 30 ° 03' 37", Longitude 90° 33' 44")
 Expected Flow: 0.038 MGD
 Discharge Route: an unnamed ditch; thence into Godchaux Canal; thence into an unnamed swamp; thence into Lake Maurepas

Outfall 102 (former Outfall 001 from Associated Terminals LPDES permit No. LA0122483)
 This outfall is internal to Outfall 002.

Discharge Type: equipment washdown (No soaps or detergents) and stormwater runoff from the process areas located in the front/South portion of the Associated Terminals facility including; uncovered bulk storage pads, uncovered loading/unloading areas, the covered main maintenance area, the covered bagging area, and the primary fuel storage area
 Treatment: none
 Location: at the point of discharge to the southeast discharge ditch, prior to combining with Outfall 002
 (Latitude 30 ° 03' 38", Longitude 90° 33' 51")
 Flow: intermittent (nonstormwater flow is 1000 gpd washdown twice a week)
 Discharge Route: through Outfall 002 to an unnamed ditch; thence into Godchaux Canal; thence into an unnamed swamp; thence into Lake Maurepas

Statement of Basis for
 Port of South Louisiana, Globalplex Intermodal Terminal
 LA0003204, AI No. 24733
 Page 3

Outfall 003

Discharge Type: non-contact stormwater runoff from corn syrup rail unloading area and warehouse areas, and previously monitored Outfall 103
 Treatment: none
 Location: at the point of discharge located on the northeast corner of the property near West 10th Street
 (Latitude 30 ° 03' 57", Longitude 90° 33' 45")
 Expected Flow: 0.112 MGD
 Discharge Route: an unnamed ditch; thence into Godchaux Canal; thence into an unnamed swamp; thence into Lake Maurepas

Outfall 103 (former Outfall 002 from Associated Terminals LPDES permit No. LA0122483)
 This outfall is internal to Outfall 003.

Discharge Type: equipment washdown (No soaps or detergents) and stormwater runoff from the process areas located in the North portion of the Associated Terminals facility including; uncovered bulk storage pads, the coal storage area, uncovered loading/unloading areas, the covered bagging area, the covered secondary maintenance area, and the secondary fuel storage area
 Treatment: none
 Location: at the point of discharge to the east drainage ditch, prior to combining with Outfall 003
 (Latitude 30 ° 03' 46", Longitude 90° 34' 00")
 Flow: intermittent (nonstormwater flow is 1000 gpd washdown twice a week)
 Discharge Route: through Outfall 003 to an unnamed ditch; thence into Godchaux Canal; thence into an unnamed swamp; thence into Lake Maurepas

4. RECEIVING WATERS

STREAM - an unnamed ditch; thence into Godchaux Canal; thence into an unnamed swamp; thence into Lake Maurepas

BASIN AND SEGMENT - Lake Pontchartrain Basin, Segment 040602

DESIGNATED USES -
 a. primary contact recreation
 b. secondary contact recreation
 c. propagation of fish and wildlife

5. TMDL STATUS

Subsegment 040602, Lake Maurepas (Estuarine), is listed on LDEQ's Final 2004 303(d) List as impaired for pathogen indicators. To date no TMDLs have been completed for this waterbody. A reopener clause was established in this permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the dry bulk handling or terminal warehousing services point source categories have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any

Statement of Basis for
 Port of South Louisiana, Globalplex Intermodal Terminal
 LA0003204, AI No. 24733
 Page 4

present state water quality standard were also eliminated.

Pathogen Indicators are not among the effluent characteristics for discharges of equipment washdown and stormwater runoff. Therefore, the discharges from Outfalls 102 and 103 should not cause or contribute to the violation of water quality standards for this parameter and no specific requirements shall be placed in the permit to address this impairment.

6. PROPOSED MODIFICATIONS

1. Add new internal Outfalls 102 and 103 for the discharges from the Associated Terminals facility.
2. The description of wastewater streams for Outfall 002 has been changed to: non-contact stormwater runoff from construction area, warehouses, and demolition area, and previously monitored Outfall 102. The current limitations are sufficient for the additional wastewaters. The expected flow, treatment, and outfall location did not change.
3. The description of wastewater streams for Outfall 003 has been changed to: non-contact stormwater runoff from corn syrup rail unloading area and warehouse areas, and previously monitored Outfall 103. The current limitations are sufficient for the additional wastewaters. The expected flow, treatment, and outfall location did not change.
4. Language regarding the approved commodities to be stored/handled at the Associated Terminals facility has been added to Part II of the permit (Paragraph 12).
5. A list of commodities proposed for storage at the Associated Terminals facility has been added as Appendix A of the permit.

7. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 6

8. COMPLIANCE HISTORY/COMMENTS

- A. WQMD – A review of the files indicates no open, appealed, or pending OES enforcement actions as of October 19, 2007.
- B. DMR Review/Excursions – No discharge from Outfall 001 was reported for the period November, 2005 through May, 2007. A review of discharge monitoring reports on file for the period beginning March, 2005 through September, 2007, revealed the following violations:

<u>Date</u>	<u>Parameter</u>	<u>Outfall</u>	<u>Reported Value</u>	<u>Permit Limits</u>
Aug., 2005	TSS	001	266 lbs/day, mon. avg.	74 lbs/day
Aug., 2005	TSS	001	266 lbs/day daily max.	133 lbs/day
Oct., 2005	BOD ₅	001	68.3 lbs/day, mon. avg.	40 lbs/day
Oct., 2005	BOD ₅	001	68.3 lbs/day daily max.	63 lbs/day
Oct., 2005	COD	001	359.1 lbs/day, mon. avg.	304 lbs/day
Oct., 2005	TSS	001	97.6 lbs/day, mon. avg.	74 lbs/day
Feb., 2007	Oil & Grease	002	21 mg/L	15 mg/L
Feb., 2007	Oil & Grease	004	36 mg/L	15 mg/L

Statement of Basis for
Port of South Louisiana, Globalplex Intermodal Terminal
LA0003204, AI No. 24733
Page 5

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040602 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the the Gulf Sturgeon and the West Indian Manatee, which are listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated October 24, 2007 from Boggs (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the the Gulf Sturgeon or the West Indian Manatee. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to modify the permit to address changes to the discharges described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Statement of Basis for
 Port of South Louisiana, Globalplex Intermodal Terminal
 LA0003204, AI No. 24733
 Page 6

Rationale for Port of South Louisiana

1. **Outfall 102**– the intermittent discharge of equipment washdown (No soaps or detergents) and stormwater runoff from the process areas located in the front/South portion of the Associated Terminals facility including; uncovered bulk storage pads, uncovered loading/unloading areas, the covered main maintenance area, the covered bagging area, and the primary fuel storage area (flow is intermittent; nonstormwater flow is 1000 gpd washdown twice a week)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	Report: Report	LAC 33:IX.2707.I.1.b.
TOC	---: 50 mg/L	(1), LA0122483
Oil & Grease	---: 15 mg/L	(1), LA0122483

Treatment: none

Monitoring Frequency: 1/quarter – retained from the current Associated Terminals LPDES permit, LA0122483

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.I.1.b. TOC and Oil & Grease limits are based on the current LPDES permit for Associated Terminals at Globalplex, LA0122483, and existing individual permits for similar facilities. The pH will be limited at the final outfall, Outfall 002.

- (1) Existing individual industrial permits for similar facilities

2. **Outfall 103**– the intermittent discharge of equipment washdown (No soaps or detergents) and stormwater runoff from the process areas located in the North portion of the Associated Terminals facility including; uncovered bulk storage pads, the coal storage area, uncovered loading/unloading areas, the covered bagging area, the covered secondary maintenance area, and the secondary fuel storage area (flow is intermittent; nonstormwater flow is 1000 gpd washdown twice a week)

<u>Pollutant</u>	<u>Limitation</u> Mo. Avg:Daily Max (mg/l)	<u>Reference</u>
Flow (GPD)	Report: Report	LAC 33:IX.2707.I.1.b.
TOC	---: 50 mg/L	(1), LA0122483
TSS	---: 50 mg/L	(1), (2), LA0122483, BPJ
Oil & Grease	---: 15 mg/L	(1), LA0122483

Treatment: none

Statement of Basis for
Port of South Louisiana, Globalplex Intermodal Terminal
LA0003204, AI No. 24733
Page 7

Monitoring Frequency: 1/quarter – retained from the current Associated Terminals LPDES permit, LA0122483

Limits Justification: Flow reporting is consistent with LAC 33:IX.2707.1.1.b. TOC and Oil & Grease limits are based on the current LPDES permit for Associated Terminals at Globalplex, LA0122483, and existing individual permits for similar facilities. The pH will be limited at the final outfall, Outfall 003.

TSS monitoring has been included based on BPJ because coal is handled in this area. The TSS limit is based on Effluent Limitation Guidelines for the Steam Electric Power Generating Point Source Category, Best Practicable Control Technology (BPT) for coal pile runoff - 40 CFR 423.12 (9), and existing individual industrial permits for similar facilities.

- (1) Existing individual industrial permits for similar facilities
- (2) 40 CFR 423.12 (9), EPA Guidelines for Steam Electric Power Generating (coal pile runoff)

BPJ Best Professional Judgement

NOTE

For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

In accordance with LAC 33:IX.2511.B.14.h, facilities classified as SIC code 4491 are not considered to have storm water discharges associated with industrial activity unless they have "vehicle maintenance shops, equipment cleaning operations, or airport deicing operations." The Associated Terminals facility does have vehicle maintenance shops and equipment cleaning operations. There is also a potential for stormwater contamination from processes including loading, unloading, and storage of cargo. Therefore, the Associated Terminals facility shall be included in the Stormwater Pollution Prevention Plan (SWP3) for the Port of South Louisiana, Globalplex Intermodal Terminal.